UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendant.

Civil Action No. 1:23-cv-11195-SHS

DECLARATION IN SUPPORT OF MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE

Genevieve Vose Wallace, declares:

- 1. I am a Partner with the law firm of Susman Godfrey L.L.P.
- 2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
- 3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the State Bar of Washington.
- 4. There are no pending disciplinary proceedings against me in any state or federal court.
- 5. I have never been convicted of a felony.
- 6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
- 7. My attorney registration number for the State Bar of Washington is 38422.

- 8. Wherefore, your declarant respectively submits that she be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-11195 for Plaintiff (The New York Times Company).
- I, Genevieve Vose Wallace, declare under penalty of perjury that the foregoing is true and correct.

Dated: February 6, 2024 Respectfully submitted,

/s/ Genevieve Vose Wallace
Genevieve Vose Wallace
WA State Bar No. 38422
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Attorney for Plaintiff
The New York Times Company